



Indiana Department of Education

SUPPORTING STUDENT SUCCESS

June 11, 2010

Dr. Eugene White, Superintendent
Indianapolis Public Schools
120 E. Walnut St.
Indianapolis, IN 46204

Dear Dr. White:

On May 11, 2010, the Indiana Department of Education's (IDOE) English Language Learning & Migrant Education staff commenced an on-site monitoring review of Indianapolis Public Schools' administration of Title III of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB), and the State of Indiana Non-English Speaking Program (NESP). Enclosed is a report based upon those reviews.

Prior to, during, and following the on-site monitoring review, the IDOE staff conducted a number of activities (described in the attached report) to verify compliance with the programmatic requirements of Title III and the State of Indiana Non-English Speaking Program.

The enclosed report summarizes the results of the on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, **Indianapolis Public Schools is responsible for taking appropriate action to remedy compliance deficiencies**. In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer-term measures are necessary, IPS must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE is available to provide technical assistance as appropriate.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities and in assisting IPS with improving the delivery of Title III and NESP services.

Sincerely,

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Marilee Updike, Title III/NESP Program Administrator, IPS
Joyce Akridge, Principal, Carl Wilde Elementary School # 79, IPS
Sharon Heathcock, Principal, Stephen Foster Elementary School # 367, IPS

**Indiana Department of Education
Title III and Non-English Speaking Program Monitoring**

District: Indianapolis Public Schools (IPS)

Monitoring Staff: Olga Tuchman, English Language Learning (ELL) Specialist, English Language Learning & Migrant Education, Division of Differentiated Learners, IDOE; Lauren Harvey, Coordinator of English Language Learning, Division of Differentiated Learners, IDOE

The Indiana Department of Education (IDOE) commenced on-site monitoring of IPS on May 11, 2010. The purpose of the on-site monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with the Title III and Non-English Speaking Program requirements.

IDOE specifically monitored in the following areas:

Monitoring Topic		Statutory Citation
1.1	Compliance with the English Language Proficiency Assessment requirements	NCLB, Title III §3113 NCLB, Title III §3116
1.2	Compliance with requirements specific to meeting the Annual Measurable Achievement Objectives (AMAOs)	NCLB, Title III §3122(a)(1-3) NCLB, Title III §3111(b)(2)(B)
1.4	Compliance with the English Language Proficiency (ELP) Standards requirements	NCLB, Title III §3113
1.5	Compliance with Data Collection and Reporting requirements	NCLB, Title III §3121; §3123 EDGAR 34; CFR 76.731
2.1	Compliance with requirements for English Language Acquisition and Language Enhancement Programs	NCLB, Title III §3111 (b)(2)
2.2.	Compliance with requirements for Activities by LEAs with a Significant Influx of Immigrant Children and Youth.	NCLB, Title III, §3114 and 3115(e)
2.3.	Compliance with Non-Public School Participation	NCLB, Title III, §9501
2.4	Compliance with Parental Notice and Outreach requirements	NCLB, Title III §3302 Title VI, 34 CFR § 100.3 (a)(b)
2.5	Compliance with Program Design and Implementation requirements	NCLB, Title III §3115

During the on-site visit, IDOE spent time interviewing staff from IPS. In addition, IDOE visited IPS Elementary School # 79 and IPS Elementary School # 367, where interviews were conducted with the principal and staff. IDOE also reviewed documents from IPS, including district ESL policies and procedures, district notices to parents and student record information. Based on the above information, the report follows.

Monitoring Topic I.1: Compliance with NCLB, Title III Compliance with the English Language Proficiency Assessment requirements

Background

IDOE interviewed the Title III Program Administrator and corporation's teaching staff regarding compliance with the English Language Proficiency Assessment requirements.

Statutory Requirements are contained in Sections 3113 and 3116.

Areas of Compliance

Home Language Survey Implementation: For the 2009-10 school year, Home Language Surveys had been completed by parents at three centralized Parent Information Center (PIC) sites during the registration process. For the 2010-11 school year, due to funding cuts the Home Language Survey will be completed by parents at each individual school building. The Home Language Survey is provided to parents in English and Spanish.

English Language Proficiency Assessment: Information on administering the Home Language Survey (HLS) is included into the IPS ESL Handbook which was reviewed during the visit, as was the HLS itself. Placement test training for ESL teachers occurs every year before school year starts; the training is done by the ESL Central office liaison. Building ESL teachers are responsible for administering the testing; ESL assistants who administer the test are trained by the LAS Links-trained ESL personnel. During the spring LAS Links administration window former IPS retired teachers trained in LAS Links English proficiency test administration are hired to do the testing. During the review the district presented an agenda for the LAS Links training of new teachers.

Data Reporting: ELL students' enrollment data are sent to the ESL Central office by the school buildings' secretaries. During the review the district presented a PowerPoint presentation used to train school secretaries on the procedure of student enrollment. The ESL Central office staff enters all the data. The team of the IPS IT data specialist and the IPS ESL Coordinator checks the accuracy of ELL students' data in the system on a regular basis and corrects all discrepancies. ELL students' data and a spreadsheet with student STN numbers and test numbers were presented as evidence that the same students who were tested with the Placement test upon enrollment participate in the LAS Links English proficiency test administration in the spring.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic I

Home Language Survey Implementation: For the 2010-11 school year, due to funding cuts the Home Language Survey will be completed by parents at each individual school building.

Recommendation: It is recommended that office staff at each building receive guidance on appropriate Home Language Survey processing to ensure effective implementation.

Placement Testing: During the interview, the Title III Administrator stated that the Placement Test is not always administered within 30 days of students' enrollment. Title III requires that parents be notified of the result of this placement assessment *within 30 days of enrollment at the beginning* of the school year, or *within two weeks of enrollment during* the school year.

Required Action: By Monday, July 12, 2010, evidence must be submitted to show that a plan is in place to ensure that the timelines for this placement testing and parent notification requirement will be met as of the beginning of the 2010-11 school year.

LAS Links test administration training: LAS Links Placement Test training and summative LAS Links English Proficiency training for test administrators occurs every year before school year starts; the training is done by the ESL Central office liaison. No sign-in sheets of trainees were provided during the visit.

Required action: During the SY 2010-11 and beyond IPS Central office must collect and keep evidence that all staff administering the LAS Links testing has received training in administering the LAS Links Placement test and/or LAS Links spring English Proficiency test. Ensure that training covers all aspects from the IDOE/CTB training. During the next Title III/NESP monitoring site visit provide these pieces of evidence to IDOE.

Monitoring Topic 1.2: Annual Measurable Achievement Objectives (AMAOs)

Background

IDOE interviewed the Title III Program Administrator, school principals, and Title III staff regarding the delivery of English language development services as they relate to meeting the AMAOs. In addition, IDOE reviewed ILP documentation provided during the on-site visit.

Statutory Requirements are contained in Section 3122(a)(1-3) and Section 3111 (b)(2)(B)

Areas of Compliance

English Language Development Services in Content Area Classes: Language development in the district is provided by ESL teachers using different approaches through a combination of push-in and pull-out for small group instruction based on levels of English proficiency. Elementary ELL students at English proficiency Level 1 and 2 are pulled out during the Reading block for 90 minutes to receive instruction from the ELL teacher using the same Reading curriculum as other students; the curriculum and reading level are modified for language development and reading instruction at different levels of ELL students' English proficiency. A number of ELL paraprofessionals are employed by the IPS ESL program to support language development instruction; ELL paraprofessionals work on ELL students' language skills under the direction of certified teachers who create lesson plans and oversee the work of instructional assistants. Individual Learning Plans (ILPs) are created and updated annually and are shared with the mainstream teachers. Teacher groups at both elementary

schools visited provided evidence of making modifications to instruction and assessment of ELL students.

AMAO Determinations: For 2008-09, IPS met the AMAO performance targets in each of the three areas (making progress, attainment of English proficiency, and Adequate Yearly Progress for the LEP sub-group). Information on how the Title III Annual Measurable Achievement Objectives (AMAO) performance targets and district accountability are calculated have been communicated to the ELL teachers and instructional assistants by the Title III Coordinator by using e-mail communications and presentations at ESL meetings. The Title III Coordinator also sent a memo to all building principals regarding the AMAO determinations. A cadre of staff participating in a program through Indiana University, including the principal at school #76, also received AMAO information. Agenda items discussing AMAOs as well as e-mails were provided as evidence. The Title III Coordinator indicated that not all classroom teachers and principals are aware of the AMAO determinations.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic I.2

Recommendation: To ensure continued success in meeting the AMAO performance targets, the school corporation's instructional leadership, including ELL program leadership, should inform all administrators and general education staff about how AMAOs are calculated and the school corporation's performance on the annual AMAO determinations in each of the three areas (making progress, attainment of English proficiency, and Adequate Yearly Progress for the LEP sub-group). Resources on AMAOs are posted at <http://www.doe.in.gov/lmmp/titleIII.html>. Additionally, it is recommended that information be shared with these staff related to analyzing ELL students' language and academic performance data; ensuring that best practices in ELL curriculum, instruction, and assessment are implemented; and strategies for effective English language development instruction and building academic content knowledge.

Monitoring Topic I.4: Compliance with the English Language Proficiency (ELP) Standards requirements

Background

IDOE interviewed the Title III Program Administrator, school principals, mainstream teachers and Title III staff regarding usage of the English Language Proficiency Standards.

Statutory Requirements are contained in Section 3113.

Areas of Compliance

Training and Technical Assistance: Evidence was provided that training and technical assistance has been provided to staff on appropriate usage and implementation of the ELP Standards as they apply to instructional planning. The ELP Standards are embedded in the Rubicon Atlas curriculum mapping training several times a year so that the ELP Standards are inform instruction based on each students' level of English proficiency.

Implementation: English Language Proficiency (ELP) Standards are utilized by ESL teachers for writing goals and lesson plans for ELL students and to support instruction and assessment of ELL students in the language development instruction and mainstream classroom. Several English/Language Arts lesson plans aligned with ELP Standards were presented during the review (English 9, 4th grade, grade 2 Reading lesson plans). This process of English/Language Arts and ELP Standards alignment is successfully implemented in some IPS elementary schools.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1.4

There are no findings, required actions, or recommendations for Topic 1.4.

Monitoring Topic 1.5: Compliance with Data Collection and Reporting requirements

Background

IDOE interviewed the Title III Program Administrator regarding the formal data reporting process specific to English Language Learners (ELLs).

Statutory Requirements are contained in Section 3121 and 3123; EDGAR 34 and CFR 76.731.

Areas of Compliance

DOE-LM Reporting:

A process is in place to ensure accurate reporting of the ELL student population data at the building and district level. ELL students' enrollment data are sent from the buildings to the ESL central office whose staff enters all the data. The information team constantly works on adding new data on ELL students, e.g. End of Course Assessments (ECA) performance data, and checking on their correctness. The spreadsheets with examples of ELL students' data were reviewed during the visit.

DOE-LM Discrepancy Process:

The ELL student information is reviewed by electronically Title III coordinator and IT data specialist on a regular basis using a team approach to address any discrepancies. Staff perform data practice runs to identify errors, corrects any incomplete or incorrect data using the information obtained from the school building student data and by contacting the families.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1.5

There are no findings, required actions, or recommendations for Topic 1.5.

Monitoring Topic 2.1: Compliance with requirements for English Language Acquisition and Language Enhancement Programs: Programmatic Support

Background

IDOE interviewed the Title III Program Administrator, school principals, and ELL teaching staff regarding English language development programs. In addition, IDOE reviewed policies and other documentation provided during the on-site visit.

Statutory Requirements are contained in Section 3111 (b)(2)

Areas of Compliance

Professional Development:

Quality on-going professional development related to LEP student instruction has been offered to instructional staff through several ELL Program initiatives. Dr. Kathryn Brooks and Susan Adams from Butler University provided 5 workshops in ESL methodology and strategies of 2.5 hours each for the instructional coaches; the goal of that training is to use the coaches to train mainstream teachers through the district training schedule. Another two-year initiative is to train all classroom teachers and administrators in vocabulary building strategies, based on R. Marzano's "Building Academic Vocabulary" program. Guidance documents on addressing the educational needs of LEP students from the IDOE, Office of English Language Learning & Migrant Education, are used in the IPS ESL Handbook which is shared with ESL staff. The Title III Coordinator sent an e-mail notification to ESL staff about the May 2010 WebEx on using LAS Links data to inform instruction.

Collaboration: Ongoing collaboration between ESL program staff and general education staff occurs in both IPS schools visited (IPS School # 79 and IPS School # 367). Teachers in both schools collaborate in planning and implementation of instruction and assessment for their ELL students. An Individual Learning Plan (ILP) is created for every ELL student and is shared with all staff. Indiana University cadre provides a free training course on ESL certification for teachers at schools # 90 and # 96 with more than 50 general education teachers participating; the training course is offered once a week for a year and a half. Student performance data are on display in both schools; data walls are used by data teams to discuss educational issues and come up with differentiated instructional suggestions and/or interventions. Additional collaboration opportunities are provided to the IPS ESL staff through district after-school ESL staff meetings led by IPS Title III Coordinator.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2.1

Professional Development: Title III, section 3115 (c)(2), requires that high quality professional development be provided to classroom teachers (including teachers in classroom settings outside of language instruction educational programs), principals, administrators, and other school or community based personnel that is:

- designed to improve the instruction and assessment of LEP children;

- designed to enhance the ability of such teachers to understand and use curricula, assessment measures, and instructional strategies for LEP children;
- based on scientifically based research demonstrating the effectiveness of the professional development in increasing children's English proficiency or substantially increasing the subject matter knowledge, teaching knowledge and teaching skills of such teachers; and
- of sufficient intensity and duration to have a positive and lasting impact on the teacher's performance in the classroom.

The Title III grant application also requires an anticipated timeline for professional development activities including dates, times, and presenters.

Required Action: The Title III Coordinator needs to document the implementation of all the professional development events listed on the district's 2010-11 Title III application with meeting dates during the school year. Follow-up also needs to occur to identify which staff have completed IDOE WebEx offerings when they are posted online. This can be done by collecting signatures from the ESL staff and other IPS staff involved in analysis of ELL students' performance data. The Title III Coordinator must find ways to disseminate the information from the WebEx training offerings, and other opportunities, to the teachers whose schedule and lack of professional development time prevents them from obtaining that information by participating in IDOE WebEx training offerings and monitor their learning. This information exchange and discussion on how the new information can be used needs to happen at the ESL monthly meetings, and other cross-department meetings. Any documentation (i.e., plan, agenda, communication, etc.) must be kept as evidence.

Collaboration: Based on staff interviews and documentation reviews, ESL and mainstream teacher collaboration to provide appropriate ELL student instruction is stronger at the elementary level than at the secondary level.

Recommendation: The district's instructional leadership including ELL program leadership needs to have data teams at the secondary level (middle school and high schools) to be examining performance and achievement data for all subgroups of ELL students and for all individual ELL students in order to provide meaningful instruction to these students to reach proficiency in English and mastery of content in subject learning. Instructional data teams also need to determine what ELL students and in what language and subject areas need additional targeted support for language development and academic achievement. These data need to be shared and discussed with mainstream teachers of ELL students on a constant basis, and appropriate instruction and interventions implemented and monitored by the leadership in every building. ELL staff needs to work with mainstream teachers on differentiating/modifying instruction for ELL students at the middle school and high school level. This can be accomplished through common planning time, staff meetings, or in-class coaching.

Monitoring Topic 2.2: Activities by LEAs with a Significant Influx of Immigrant Children and Youth

Background

IDOE interviewed Title III Program Administrator and reviewed documentation provided: 2009-10 Title Grant application: narrative and budget; enrollment lists of newcomer immigrant ELL students. The district received an additional Title III funding of \$96,080.00 based on a significant influx of immigrant students in 2007-08.

Statutory Requirements are contained in Section 3114 and 3115 (e)

Areas of Compliance

Significant influx of immigrant students: Based on an average increase over the two preceding years, IPS received additional Title III funds in the amount of \$96,080 for the 2009-10 school year. Newly arriving students and their entry dates into the U.S. have been consistently reported by the district to the IDOE through the DOE-LM reporting. Immigrant students' enrollment records with data on countries of origin and dates of the U.S. schools initial enrollment were provided during the interview.

Approved Activities: A total of \$96,080 in Title III immigrant influx funds were allocated for 2009-10. \$50,000 was used by the district to purchase computers and language development software program at School # 79 to be used for language development of ELL students. \$15,000 was used to pay the Butler University ESL chair instructors to conduct general education teachers' training on ESL strategies, as well as to purchase books used in that training which were distributed to the staff. The rest of the funding was used for supplies (ESL books and instructional materials) and paying interpreters to translate during parent meetings. The rest of the funding, generated by the non-public Title III immigrant students, was used to buy Smart Boards and computers, as well as to pay ESL conference fees for non-public school's staff teaching ELL students.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2.2

There are no findings, required actions, or recommendations for Topic 2. 2.

Monitoring Topic 2.3: Non-Public School Participation

Background

IDOE interviewed Title III Program Administrator regarding communication with and guidance/support provided to non-public schools.

Statutory Requirements are outlined in Title III, Section 9501.

Areas of Compliance

Communication: IPS Title III Coordinator offers guidance and assistance to non-public schools staff on the ways to serve their ELL students. Non-public staff educators are invited to the IPS ESL program meetings; several of them participated in Sheltered Instruction Observation Protocol (SIOP) training. All newly enrolling students in non-public schools are given the Home Language Survey to identify students who need to be tested for English proficiency. For the testing a Woodcock-Munoz English proficiency test is used purchased with the non-public Title III funding.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2.3

Communication: The Title III grant application assurances require that the school corporation consult private schools in developing the sub-grant application. Consultation must ensure the equitable participation of non-public schools based on a process that includes timely and meaningful consultation. The school corporation must consult with non-public schools to determine how needs of LEP students will be identified; what services will be offered; how, where, and who will provide services; and the size, scope, and delivery of services.

Required Action: IPS must involve the non-public schools that have reported LEP students and generated Title III funding in the development of 2010-11 Title III application. Evidence must be provided in the grant application of timely collaboration (i.e. letters, meeting agendas, consultations on the language program implementation, etc.). A letter should be sent to each non-public school to initiate contact and to describe the services available to non-public LEP students. It is recommended that each non-public school that generated Title III funds sign-off on a letter to indicate participation in Title III.

IPS must improve communication with non-public schools about their English language development services. Consider all non-public staff involved in providing language development to non-public schools' ELL students to be part of the IPS ESL staff; include them on any communications sent to any ESL IPS staff or any communications sent to general education teachers in relation to education of ELL students.

Monitoring Topic 2.4: Compliance with Parental Notice and Outreach requirements

Background

IDOE interviewed the Title III Program Administrator and reviewed additional documentation regarding parental notice and outreach requirements.

Statutory Requirements are outlined in Title III, Section 3302 and Title VI 34 C.F.R. § 100.3 (a)(b).

Areas of Compliance

Annual Parental Notification: IPS provided evidence of meeting the parent notification about their child being tested and placed into the language development program within the 30 calendar-day requirement.

Parental Outreach: IPS has an effective communication system in place to connect with parents and send all important information/notices to their homes. EdConnect system is used to communicate information to families based on the communication need and parent populations. Language Training Center interpreters in different languages are used during ELL parents' meetings, as well during meetings with a counselor or during evaluations for special education. Parenting classes are provided for IPS ELL students' parents. Parent sign-in sheets for numerous parent meetings were provided during the review. Other support programs are provided such as BRIDGE program for teenage students that give guidance and support that many ELL students lack in their homes due to unfamiliarity of their parents with both requirements and possibilities of the U.S. educational system and life in general in the U.S.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2.4

There are no findings, required actions, or recommendations for Topic 2. 4.

Monitoring Topic 2.5: Compliance with Program Design and Implementation Requirements

Background

IDOE interviewed the Title III program administrator, school principals and Title III program staff regarding program design and implementation requirements.

Statutory Requirements are contained in Section 3115.

Areas of Compliance

Certified Staff are Fluent in English: IPS provided evidence that all certified and classified staff working in language instruction programs is fluent in the English language. All instructional assistants have to pass PRAXIS to be employed as paraprofessionals in IPS. All paraprofessionals currently employed by the IPS ESL program have either passed the PRAXIS test with an appropriate score, or have degrees in ESL instruction, or are certified in ESL instruction, or are Indiana licensed teachers. A list of all ESL staff with appropriate degree or certification was provided during the review.

Supervision of Instructional Paraprofessionals: IPS is implementing curriculum mapping in all schools at the elementary level: this approach uses common lessons created and modified by teachers to the levels of English proficiency of ELL students in their classrooms; general education teachers or certified ESL teachers guide instructional assistants who provide small group or individual support to ELL students. The document describing responsibilities of a bilingual instructional assistant to a mainstream teacher of ELL students is included into the IPS ESL Handbook and was provided for review.

English Language Development Program Model: IPS English development programming is comprised of push-in and pull-out services. The program uses ESL instructional assistants for additional language development.

Instruction and Assessment Adaptations: At the elementary level LAS Links English proficiency test results are analyzed in all domains (Listening, Speaking, Reading, and Writing). Instruction and assessment modifications are implemented based on ELL students' Individual Learning Plans (ILP) information. Structured intervention time is scheduled for Reading and Math in all IPS elementary schools. ELL students' files are kept at each building. ELL students' cumulative folders were presented and reviewed during the visit.

School # 79 demonstrated their use of common lesson plans; instruction outcomes/results are sent to reading coaches and building principal. Diagnostic formative tests are used to inform instruction, with individual assessments used with every student in 1st grade. The school has an intervention/remediation block built into the school's schedule where individual students and small groups of students receive support in identified areas of weakness. Grading is modified to the levels of English proficiency of the ELL students so that they are able to show their knowledge in various ways. A narrative summary of achievement/progress is used by teachers to describe achievement and learning of newcomer ELL students with very low English proficiency before they can be graded.

School # 367 demonstrated their implementation of reading instruction provided to ELL students based on their level of English proficiency in all four domains ((Listening, Speaking, Reading, and Writing), with constant informal assessments and progress monitoring (DIBELS, SRI and other assessments). High degree of collaboration was demonstrated by the school staff; this is accomplished through monthly grade level meetings and structured teacher planning time. All ELL students are taught ISTEP+ preparation strategies. ELL students' Individual Learning Plans with appropriate modifications to instruction and assessment were reviewed during the visit.

Reclassification: IPS provided evidence that monitoring and reclassification processes are documented and are consistent for ELL students throughout the school corporation. Sample monitoring forms and lists of FEP (Fluent English Proficient) ELL students were presented during the visit.

Scheduling: Individual Learning Plans with modifications and accommodations required for all ELL students of Levels 1 – 4 were presented and reviewed during the visit at the elementary level. A memo about scheduling of high school ELL students that is sent to school principals was presented during review. Sheltered classes are provided by IPS in high school in order to increase ELL students' comprehension of subject area content as well as to increase their participation in core curriculum learning and practice of academic language.

Retention: Indiana Department of Education's guidelines and policies related to the retention of ESL students are used in the IPS ESL Handbook:

<http://www.doe.in.gov/lmmp/pdf/retentionpolicy.pdf>. The IPS retention policy is described in the IPS ESL Handbook stating that "...In accordance with Performance Based Accreditation guidelines, a school corporation shall not retain language minority students solely on the basis of English language proficiency. ELL students in IPS must be reviewed on an individual basis. If the language proficiency assessment indicates that the student is below level 5 (native-like proficiency) in English, grading, and assessment procedures must be adapted to their proficiency level. If adaptations have not been made accordingly, the student must not be failed or retained." Retention of ELLs IPS form is used and has been presented indicating ELL students' deficiencies not related to English.

Special Education Referrals: Title IPS III Coordinator provides leadership in instilling the ELL policies and guidance in their implementation as far as referrals of ELL students to special education evaluation. A thorough process is used to decide on the appropriateness of such referrals. IPS Special Education Referrals document is included into the IPS ESL Handbook with several sections: general education intervention process, general criteria for Special Education referral, group approach to evaluation and general procedures, ESL and mainstream staff roles in the process, ESL and Special Education staff roles, evaluation team members' roles, etc. IDOE process recommended by the Office of English Language Learning & Migrant Education is used while making any decision: <http://www.doe.in.gov/lmmp/pdf/referraltospecialeducation.pdf>.

Collaboration Across Programs: All elementary building except one are Title I buildings. ELL students are able to get assistance from various programs; they are provided extra educational support through the variety of programs for which they may qualify.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2.5

Scheduling: The Title III Coordinator must improve collaboration with middle school and high school counselors. This coordination must ensure that ELL students are scheduled with the most effective teachers who have experience and knowledge in educating ELL students.

Recommendation: The 2010-11 Title III application must demonstrate that collaboration efforts are used in ELL students' scheduling at elementary, middle school, and high school level. Evidence must be provided that students are scheduled for classes based on their specific language development needs and ESL teachers' input and their knowledge of the language levels and capabilities of every ELL student is used in scheduling.